

EXHIBIT A

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The Dies & Hile Claimants have provided micro-analytical product identification reports prepared by Materials Analytical Services ("MAS") laboratories in Atlanta, Georgia, and/or other product identification information, with their Proof of Claim forms. The Dies & Hile Claimants anticipate that evidence regarding the identification of the Grace ACM products will be offered through the expert testimony of William Longo, Ph.D. as discussed in paragraph Roman Numeral I above. Additionally, other MAS personnel involved in the micro-analytical testing of bulk samples taken from Dies & Hile Claimants' buildings may be offered for certain discrete issues.

William Longo, Ph.D. Dr. Longo is an expert in the fields of microscopy, materials science and engineering. He holds an M.S. and Ph.D. in Materials Science and Engineering from the University of Florida. He is president of Materials Analytical Services, Inc., a company specializing in materials characterization.

Throughout his career he has analyzed asbestos bulk, air and settled dust samples for both private clients and governmental agencies. He has consulted for the EPA on its protocol for asbestos sampling at Superfund sites and the dust analysis protocol. He assisted NATO in the analysis of materials from school buildings located overseas and the Berlin Wall for the presence of asbestos. He has analyzed asbestos samples for corporations that formerly manufactured asbestos-containing products, including W.R. Grace.

Dr. Longo authored and co-authored numerous articles regarding asbestos sampling and testing techniques. He has served on the Peer Review Group Committee for the EPA, a group responsible for guiding EPA's research involving various asbestos issues in buildings. He was invited by the EPA, along with others, to help develop its protocol for taking and analyzing

settled dust samples during some of its research studies. Dr. Longo is a member of the American Society of Testing Materials (ASTM Subcommittee for asbestos sampling and analysis). His contribution to this particular subcommittee involved such things as being the primary author of the ASTM method D-5755-95, entitled “Micro-Vacuum Sampling and Indirect Analysis of Dust by Transmission Electron Microscopy for Asbestos Structure Number Concentration.”

Dr. Longo is an expert in the field of materials characterization, the use of materials for specific applications, and the ability to determine their physical and chemical properties using recognized testing procedures. He will testify about testing protocols routinely used for materials characterization and analyzing asbestos samples, including sample preparation and fiber counting. He will discuss the standard and accepted scientific methods and techniques used for identifying and quantifying asbestos in various samples such as air, dust and bulk in buildings and the basis of same. He may testify concerning the background levels of asbestos found in buildings. He will testify concerning the different forms of asbestos, including their morphology and mineralogy.

He may discuss the standards and regulations applicable to asbestos in buildings. He will testify concerning the proper assessment techniques to determine and measure asbestos fiber release, contamination in buildings and the ambient environment. Dr. Longo may testify concerning product identification of Debtor's asbestos-containing products through the use of micro-analytical and/or chemical testing of asbestos-containing bulk samples, including the analytical techniques involved and the interpretation of data obtained.

He may give expert testimony regarding the history of his analysis of product identification of W.R. Grace asbestos-containing products and issues related thereto. He may give testimony concerning the testing, samples and/or methods used by other scientists. He may

be asked to give testimony consistent with and/or similar in substance to the testimony he has given in property damage cases prosecuted by Martin Dies, Daniel Speights and Edward Westbrook on behalf of PD claimants.

With regard to Dr. Longo's product identification related testimony on behalf of the Dies & Hile Claimants, he will testify with regard to each such product identification micro-analytical MAS Report. Dr. Longo will testify regarding the receipt by his laboratory of ACM bulk samples from Construction Inspectors, Inc. personnel obtained from Claimants' buildings. He will testify regarding the testing performed on each such bulk sample including but not limited to the PLM Analysis and the Optical Data for Asbestos Identification, the findings with regard to asbestos mineral, other fibrous components and non-fibrous components and the results of the Effervescence test and binder description. He will discuss his findings with regard to the TEM Analysis, including the mineral analysis sheet and the identification of asbestos minerals as set forth in the MAS Report. He will testify with regard to the MAS Report for each such bulk sample and his reasons for concluding that such bulk sample(s) represent a Grace ACM product and as well the name of the product. He may testify regarding the applicable Grace product formulas and/or product manufacturing related documents and his experience in testing and identifying other similar Grace fireproofing and/or acoustical ACM products.